

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

SEAN COMBS,

Defendant.

X

:

: Case No. 24-cr-542 (AS)

:

:

:

:

:

:

:

:

:

:

X

NOTICE OF MOTION

PLEASE TAKE NOTICE that Non-Party Warner Bros. Discovery, Inc. (“WBD”) upon the accompanying Memorandum of Law, Declaration of Thomas B. Sullivan dated April 8, 2025 and accompanying exhibits, and all prior pleadings and proceedings hereto, by its undersigned counsel, hereby respectfully moves this Court, before the Honorable Arun Subramanian, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15A, New York, NY 10007, for an order quashing the subpoena *duces tecum* served on it by defendant Sean Combs and for such other and further relief as the Court may deem just and appropriate.

Dated: April 8, 2025

Of Counsel:

Paul J. Safier
BALLARD SPAHR LLP
1735 Market St., 51st Fl.
Philadelphia, PA 19103
Phone: (215) 665-8500
Fax: (215) 864-8999
safierp@ballardspahr.com

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Thomas B. Sullivan
Thomas B. Sullivan

1675 Broadway, 19th Floor
New York, NY 10019-5820
Phone: (212) 850-6139
Fax: (212) 223-1942
sullivant@ballardspahr.com

*Counsel for Non-Party Warner Bros. Discovery,
Inc.*